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*Attorneys for Plaintiff/Counterclaim Defendant  
BANCROFT LIFE & CASUALTY ICC, LTD.*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

-o0o-

BANCROFT LIFE & CASUALTY ICC, LTD.,

Plaintiff,

vs.

FFD RESOURCES IV, LLC,

Defendants.

FFD RESOURCES IV, LLC AND FFD VENTURES,  
LLP,

Counterclaim Plaintiffs,

vs.

BANCROFT LIFE & CASUALTY ICC, LTD.,

Counterclaim Defendant.

Case No.:3:11-cv-00214-LRH-WGC

**PLAINTIFF/COUNTERCLAIM  
DEFENDANT'S FIRST  
UNOPPOSED MOTION FOR  
EXTENSION OF TIME TO  
RESPOND TO FFD RESOURCES  
IV, LLC AND FFD VENTURES,  
LLP'S MOTION FOR LEAVE TO  
FILE AMENDED ANSWER AND  
COUNTERCLAIMS**

Plaintiff, BANCROFT LIFE & CASUALTY ICC, LTD, (hereinafter "Bancroft")

by and through its counsel of record, the law firm of MEIER & FINE, LLC, hereby files  
this Unopposed Motion for an Extension of Time to Respond to FFD Resources IV, LLC

- 1 -

File No.: 1625.001

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1 and FFD Ventures, LLP's (hereinafter collectively "FFD") Motion for Leave to File  
2 Amended Answer and Counterclaims filed herein on October 19, 2011 [Dkt. 48]; and  
3 respectfully provide the Court the following:

- 4 1. Bancroft initiated the instant action by filing its Complaint [DKT. 01] on  
5 March 23, 2011;
- 6 2. FFD filed its Answer and Counterclaims [Dkt. 16] against Bancroft on  
7 August 5, 2011;
- 8 3. FFD filed its Motion for Leave to Amend Answer and Counterclaims [Dkt  
9 48] on October 19, 2011;
- 10 4. Bancroft filed its Motion to Dismiss FFD's Counterclaims [Dkt. 49] on  
11 October 20, 2011;
- 12 5. The last day for Bancroft to file its response to FFD's Motion for Leave  
13 [Dkt. 48] to Amend is November 3, 2011.
- 14 6. The parties are in process of settlement negotiations and accordingly,  
15 Bancroft requests as extension of time to respond to FFD's Motion to  
16 Amend [Dkt. 48] to Friday, November 11, 2011;
- 17 7. FFD does not oppose an extension of this deadline

18 For the above-stated reasons, Bancroft respectfully submits that the Court grant  
19 this motion to extend time for Bancroft to respond to FFD's Motion to Amend [Dkt. 48]

20 to

21 ///

1 November 11, 2011 and to enter the proposed Order set forth below.

2 Dated this 3<sup>rd</sup> day of November, 2011.

3 MEIER & FINE, LLC

4  
5 /s/ Marilyn Fine, Esq.

6 MARILYN FINE, ESQ.

7 Nevada Bar No. 005949

8 RACHEL E. DONN, ESQ.

9 Nevada Bar No. 010568

10 Meier & Fine, LLC

2300 West Sahara Avenue, Suite 430

Las Vegas, Nevada 89102

11 Attorneys for Plaintiff

12 **ORDER**

13 IT IS SO ORDERED.

14 Dated: 11.10.11.

15  
16 Walter S. Cobb  
17 UNITED STATES MAGISTRATE JUDGE

18  
19 ###